

Broker, Peter (Law)

From: Broker, Peter (Law)
Sent: Friday, January 10, 2020 12:53 PM
To: 'Elena Cohen'
Cc: '<Gideon@gideonlaw.com>'
Subject: RE: Edrei- notes from call

Good Afternoon Elena:

I apologize for the slow response. This all is accurate and acceptable to defendants, with the one caveat that should defendants find something in the medical records or during depositions that indicates some or all pre-incident employment records may be relevant, that defendants are precluded from seeking them at that point.

Best,

Peter

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From: Elena Cohen [mailto:elenacohenesq@gmail.com]
Sent: Wednesday, January 08, 2020 12:06 PM
To: Broker, Peter (Law)
Cc: <Gideon@gideonlaw.com>
Subject: Edrei- notes from call

Hi Peter,

Just memorializing what we discussed just now on the phone:

- We're willing to answer Interrogatory #5 on employment narrowed to the time of the incident to present. We will also answer the doc request on unemployment records as currently drafted. As I explained on the phone, I don't see the relevance of employment records pre-incident since there is no lost wages claim. Let me know if this is acceptable to defendants.

- Re: Int. 10 on insurance records, as discussed it would be incredibly time consuming and would produce a lot of irrelevant information to track down every time a doctor's office submitted a claim to an insurance company after the Plaintiff went to the doctors in the past 10 years. We could instead I.D. the health insurance company of each Plaintiff for the past 10 years and provide HIPAAS to you, so that you can request any insurance info you think is relevant. Let me know if this is acceptable or if you have another suggestion for a way to make responding to this request less burdensome.

- We'll have verified amended responses to the interrogatories as agreed in our M+C by January 14, with the exception of Plaintiff Edrei who is studying in Scotland and will require additional time to verify in front of a U.S. notary and mail to the U.S. We'll receive your verified amended responses by January 14 as well.
- You'll have a draft letter to us by Friday for the Court on extending discovery deadlines, so that we can file with the Court by the middle of next week.
- We'll get back to you with any edits on the 502(d) order by Friday
- We'll both exchange privilege logs on Friday

Let me know if any of this isn't accurate,

Elena

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Elena L. Cohen, Esq.
President, National Lawyers Guild

Pronouns: she/her/hers

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